

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No. 08-13555 (JMP)  
: (Jointly Administered)  
LEHMAN BROTHERS HOLDINGS, INC., *et al.*, :  
: Debtors. :  
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**STIPULATION AND ORDER BETWEEN THE DEBTORS AND GOLDMAN SACHS  
RESOLVING THE DEBTORS' MOTION TO COMPEL AND GOLDMAN SACHS'S  
CROSS-MOTION FOR A PROTECTIVE ORDER**

This stipulation and order is executed this 21st day of June, 2011, between Lehman Brothers Holdings, Inc. ("Lehman") and its affiliated debtors (collectively, the "Debtors") and Goldman, Sachs & Co. and The Goldman Sachs Group, Inc. (collectively, "Goldman Sachs"). The Debtors and Goldman Sachs shall each be referred to individually as a "Party" and collectively as the "Parties."

WHEREAS, the Debtors moved to compel the production of documents from Goldman Sachs on May 31, 2011 (the "Motion") [D.E. #17231];

WHEREAS, on June 13, 2011 Goldman Sachs filed an objection to the Motion and cross moved for a protective order (the "Cross-Motion") [D.E. # 17640];

WHEREAS, the Debtors and Goldman Sachs have reached an agreement resolving the Motion and Cross-Motion; and

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned  
counsel, that:

1. Goldman Sachs shall complete its production responsive to the March 1, 2011 supplemental request, as narrowed by the subsequent agreement of the Parties, on a rolling basis. Accordingly, Goldman Sachs shall: (1) make a first production of responsive, non-privileged documents to the Debtors on June 21, 2011; (2) make a second production of responsive, non-privileged documents to the Debtors on July 14, 2011; and (3) make a final production of non-privileged documents responsive to the Supplemental Requests to the Debtors on or before July 22, 2011; and

2. This Stipulation may be executed in counterparts and such counterparts may be exchanged by facsimile or email.

**KASOWITZ, BENSON, TORRES &  
FRIEDMAN LLP**

**CLEARY GOTTlieb STEEN &  
HAMILTON LLP**

By: /s/ Michael J. Bowe  
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*Attorneys for The Goldman Sachs Group, Inc.  
and Goldman, Sachs & Co.*

SO ORDERED:

Dated: New York, New York  
June 28, 2011

s/ James M. Peck  
Honorable James M. Peck  
United States Bankruptcy Judge